

The Honorable Brian D. Lynch
Chapter 13
Hearing Date: July 17, 2019
Hearing Time: 1:30 pm
Response Date: July 10, 2019
Hearing Location: Tacoma, WA

IN THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

In re:

Case No. 14-45915-BDL

TODD LINCOLN SHILLAM

MOTION TO APPROVE SETTLEMENT AND
DEBTOR'S EXEMPTIONS

COMES NOW Todd Lincoln Shillam, the above referenced Debtor(s) and files this
Motion to approve settlement and approve Debtor(s) exemptions.

Debtor(s) moves for approval to settle the debtor's post petition settlement which has
been amended into Schedules A/B and C. Debtor has also requested that due the confidential
and nature of the case that the settlement be allowed to be filed under seal by a separate motion.
The net settlement amount is \$50,996.58. The Trustee has been provided a copy of the
Settlement check. The net settlement of \$50,966.58 minus a 11USC(d)(5) exemption claimed on
Amended Schedule C of \$10,705.00 less Chapter 7 administrative fees if the case were
administered as a Chapter 7 of \$4779.16 equals a \$35,512.42 liquidation value. The Debtor is
currently paying a total of \$7,414.51 to unsecured creditors in the current plan. This leaves an
unexempt liquidation value of \$28,097.91 which will be paid to Plan upon entry of the Order
approving the settlement.

MOTION

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1 There is no attorney to appoint nunc pro tunc in this matter.

2 **WHEREFORE** Debtor(s) pray for approval of the Settlement and Allowance of the
3 Exemptions as set forth above and in the Amended Schedules A/B and C in this case.

4 Dated June 13, 2019.

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6 Presented by:

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9 /s/ Ellen Ann Brown
10 Ellen Ann Brown WSB27992
11 Attorney for Debtors
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